

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	Case No. 1:23-cr-00125-MHC-RGV
)	
TEREZ MONTAVIOUS PIPPINS,)	
Defendant.)	

UNOPPOSED MOTION TO CONTINUE REPLY DEADLINES

Comes now TEREZ MONTAVIOUS PIPPINS, by and through his counsel of record, and hereby files this motion for extension of time to file replies in support of motions he previously filed (docs. 424, 425, 426).

In support whereof, counsel shows the following:

On January 1, 2024, Mr. Pippins filed three motions to suppress evidence:

1. motion to suppress evidence obtained from cell phones (perfected)
(Doc. 424)
2. motion to suppress evidence obtained from icloud account (perfected)
(Doc. 425)
3. motion to Suppress Evidence obtained from vehicle tracker (perfected)
(Doc. 426)

The government filed its response to these motions on March 6, 2024. Docs. 487, 488, 489. Mr. Pippins previously requested a one-week continuance of his reply deadline, which this Court granted. Mr. Pippins' reply is now due on March 27, 2024. Doc. 406.

Late in the day on March 27th, the parties began discussing a potential resolution for this case. Counsel would like time to discuss this matter with Mr. Pippins to determine if any resolution can be reached before filing additional briefing on the present motions. If a resolution is reached, no further briefing will be required. For this reason, counsel is asking for an additional one-week continuance of the reply deadlines.

This extension will give counsel and Mr. Pippins time to determine if a resolution can be had and could, therefore, conserve government and court resources. AUSA Teresa Stolze has no objection to this request.

Counsel requests that the time of the extension to file motions and complete the pretrial conference be excluded under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7).

For all of these reasons, Mr. Pippins asks that this Court grant his request for a one-week extension of the reply filing deadline.

Respectfully submitted this 27th day of March 2024.

s/Saraliene S. Durrett
SARALIENE S. DURRETT
1800 Peachtree Street, Suite 300
Atlanta, GA 30309